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ABSTRACT

"Learnfare" is a term applied to the mandating of school attendance for teen parents and/or school age dependent children in households receiving Aid to Families with Dependent Children (AFDC) benefits as a condition of continued eligibility. This idea emanates from policymakers' concern about high truancy and dropout rates generally, basic skills deficits among many AFDC recipients, and the prospect of long-term welfare dependency for poorly educated populations. However, a learnfare model that applies sanctions for poor school attendance without improving the educational services available to students who are habitually absent will likely achieve neither the nominal goal of attendance improvement nor the more relevant goal of educational remediation. Policymakers' energy would be better spent in providing at-risk students with schools they consider worth attending than in targeting short-term goals without improving the schools' ability to educate. Some states have made punitive learnfare a first choice attendance-improvement program instead of a last resort. By oversimplifying the reasons for the academic failure of poor children and diverting attention from institutional reform issues, learnfare could undermine more systematic and comprehensive efforts to improve the educational prospects of at-risk students. This document describes existing learnfare models in Minnesota, Ohio, Maryland, Florida, New Jersey, New Mexico, and Wisconsin, and discusses a failed attempt to institute learnfare in California. A proposal for an alternative program for teen parents is presented. (PB)

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PREPARING FOR LEARNFARE: SETTING THE CONDITIONS FOR A QUESTIONABLE EXPERIMENT

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Preparing for Learnfare: Setting the Conditions for a Questionable Experiment

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The Center for Law and Social Policy, founded in 1967, is one of the first and most successful public interest law firms in the country. It has developed new areas of the law (mental health, women's rights, environmental) and has served as a model for similar firms nationwide.

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Introduction

This article will explore and appraise an increasingly popular experiment in state welfare programs, mandating school attendance for teen parents and/or school age dependent children in AFDC households as a condition of continued eligibility. The idea of legislating a link between school attendance and the receipt of AFDC benefits, labelled "learnfare," emanates from state policymakers' concern about alarmingly high truancy and dropout rates among students generally, basic skills deficits among many AFDC recipients and the specter of long term welfare dependency as the fate of the poorly educated in an increasingly complex and demanding labor market. These policymakers' faith in education as an antidote to economic hardship has led them to conclude that an easily accessible lever, grant reducing AFDC sanctions, represents an appropriate tool for improving the educational outcomes of AFDC dependent youth. Regrettably, the proponents of learnfare initiatives frequently fail to formulate an education equation that contains more than just an attendance variable, neglecting to mandate a connection between AFDC youths' return to school and the delivery of the special educational and social services needed by this impoverished and often discouraged group of students.

After describing the lessons to be learned from existing program designs and the controversies they have engendered, this article will offer an outline of desirable program components and will address the question of what subset of the school age AFDC population should be targeted for participation in such efforts. It will conclude with an assessment of the advisability of enacting learnfare programs. Through an examination of the issues and dilemmas posed by learnfare initiatives, this analysis should help advocates prepare for legislative, administrative and litigative representation of AFDC recipients in states considering the learnfare option.

The Motives for the Learnfare Method

Educators' concern about truancy has mounted in recent years as they have realized that excessive absenteeism is a predictable indicator of eventual academic failure. Their concern has now permeated the realm of public assistance administration, prompting calls for the use of the welfare system's access to information about poor families and leverage over such families' finances as the way to control truancy among one set of troubled students.

Some states now see learnfare sanctions as the only way to get the attention of parents whom policymakers regard as disinterested and irresponsible. California's Commission on Educational Quality, for example, recently endorsed the sanction aspect of a learnfare model, saying:

> *One way of encouraging attendance among low-income students those who have been shown to be the most at-risk of dropping out of school is to reduce welfare benefits to parents who fail to take steps to insure that their children attend school as required by law. Although this may appear to be a harsh measure, the penalty for not taking stern action is almost certainly a lifetime of poverty for the unschooled child.*

In taking such a position, however, learnfare proponents overstate the necessity of a sanction-centered approach, ignoring the fact that less punitive measures to get parents' attention and, perhaps more importantly, to solve students' school problems may not have ever been tried.

For the most part, states have been moved to adopt a learnfare strategy by fears that limited educational attainment and poor basic skills will condemn AFDC students to the poverty of prolonged welfare dependency. Due to their poverty, AFDC children are at greater risk for educational failure, according to Berlin and Sum in Toward a More Perfect Union: Basic Skills, Poor Families and Our Economic Future. Poor youths are four times as likely to have poor basic skills as youths from families living above the poverty level. Students with poor basic skills, defined as testing in the bottom twenty percent of students in the relevant age group on a standard basic literacy exam such as the Armed Forces Qualifying Test, are nine times as likely to drop out of school as students with average basic skills.

Once any student drops out of school, his or her economic prospects decline precipitously, reducing the likelihood of being employed and shrinking expected cumulative lifetime earnings to two-thirds of what high school graduates can anticipate. Faced with such a dismal economic future, poorly educated youths and their children may have few income alternatives other than AFDC. Responding to these youths' predicament, some states have turned to learnfare, advertising this type of experiment as a means to prevent long-term dependency and promote self-sufficiency. In trying to force AFDC youth to finish school, states, such as Maryland and Minnesota, believe they are acting to ensure that at least one subset of AFDC youth, pregnant and parenting teens, will acquire "the minimum level of education needed to become self-sufficient." As explained by Ohio Governor Celeste when he announced Ohio's teen parent focused Project Learn:

We have no interest in being punitive . . . in coming down hard on those who have had a rough start in life. But it's about time our welfare system reflected our strong belief in education, and our concern that these young mothers are in danger of spending a life on the dole if they don't pick up the basic skills essential in today's job market.

To states commencing a learnfare experiment, connecting school attendance and continued welfare eligibility is attractive because it can be seen as a natural outgrowth of the social contract theory of public assistance in which work or work preparation activity becomes an AFDC recipient's contribution in a system of reciprocal client/agency responsibilities. As this concept gains currency in the world of public benefits administration, many more states may join Wisconsin, the first state to implement a learnfare program, in concluding, "For teens, school attendance is the appropriate equivalent of adult work and should be treated as seriously as work."

The Characteristics of Existing Learnfare Models

In order to implement a learnfare program, a state must apply to the Secretary of Health and Human Services for a waiver authorizing this departure from standard practice. 42 U.S.C. 1315. Existing federal regulations, 45 C.F.R. 233.90(b)(2) prohibit the denial of AFDC benefits to a minor member of any AFDC household on the basis of failure to attend school or make satisfactory grades. To evaluate the promise and problems associated with learnfare initiatives, it is helpful first to survey the elements of existing or enacted programs that tie a family's continued receipt of AFDC benefits to regular attendance by selected school age family members. Each program will be described in terms of:

- the persons in the assistance unit covered by the school attendance requirement;
- the program's definition of cooperation and specified exemptions from participation;
- the support service guarantees offered to participants;
- the provision made for the parallel delivery of special educational services; and
- the sanctions imposed on affected recipients.

Minnesota

Minnesota has created an attendance requirement for minor parents on AFDC with children six weeks of age and older. The minor parent can satisfy this requirement by attending regular high school or by participating in

an alternative educational program leading to receipt of a high school diploma or a GED certificate. The minor parent's attendance is verified quarterly by school officials.

The teen parent will not be considered in violation of the attendance requirement on a given day or for an extended period if the public school fails to cooperate in accurately reporting the student's attendance, if she or her child is ill, if her child care arrangement is interrupted, or if she must attend medical appointments or appointments with courts or other public agencies. The minor parent will be completely exempted from participation if her daily roundtrip commute to school exceeds two hours (excluding child care transportation time), if the school district offers no program specifically geared toward the school age parent, if her child is six to twelve weeks old and no school based care is available or if a physician verifies that the health of either mother or child requires that they remain at home for longer than six weeks. The availability of child care and transportation is also a precondition to the minor parent's participation.

The agency will offer the participating student a contract enumerating the rights and responsibilities of both the student and social service agency and setting out a set of service and performance goals involving student, school and agency. The student may have an adult of her choice assist in developing her service plan and her progress will be monitored quarterly by the agency. Should the minor parent fail to attend school regularly without excuse or exemption, she will be subject to the following sanction sequence. After the first violation, half of the monthly grant will be made in the form of protective payments. For a second violation, all of the grant will come through protective payments. After a third violation, the grant will be reduced by deducting the teen parent's portion from the grant.

In addition to the learnfare initiative, Minnesota has simultaneously altered its education code. During its last legislative session, the state made school attendance mandatory until age 18 and now permits high school enrollment by students up to age 21, provided they are within two school years of graduation. This change will allow minor parents who return to school as a result of learnfare to complete their high school education despite pre-existing age limitations on enrollment. Finally, and most significantly for learnfare students, the state has mandated the development of an educational program for pregnant and parenting minors. The state Department of Education will design the model program and provide technical assistance to local school districts as they try to implement the program.

Ohio

Ohio's Project Learn, set to go into effect in all counties in the state by September 1989, also requires all minor parents on AFDC to attend high school, a GED program or a vocational educational facility. Day care and transportation must be available if the minor parent is to be required to participate. The state will absorb the costs of transportation and child care. Although recognizing that school based child care would often be the most desirable option for teen parents and their children, the state doubts that many school facilities can be adapted to meet licensing standards and to create the 6000 to 9000 new day care slots that will be needed by program participants.

Widening the scope of support services and program components, the Ohio program will guarantee a summer job to participating students through the JTPA program. Interestingly, the state also plans to revise its current child support enforcement prioritization schedule to give increased attention to cases involving participants in Project Learn, concentrating on improving efforts to obtain voluntary acknowledgments of paternity from young fathers.

Ohio plans to provide educational assistance to Project Learn participants in part through an expansion of the state Department of Education's GRADS program. GRADS is a vocational education program aimed at keeping pregnant and parenting teens in their home school until they receive their diplomas. GRADS supplements a standard vocational educational curriculum with family life, nutrition and family planning classes and can boast that 89% of its participants stay in school. At the end of the last school year, GRADS represented the Department of Education's fastest growing program, serving 4000 students. Further expansion is planned to accompany the implementation of Project Learn.

If Project Learn teens have already dropped out of school, they may return to participate in GOALS, another Department of Education program, which offers GED certificate instruction. Unfortunately, GOALS' success rates to date are rather poor, with only 32% of participants demonstrating "positive progress" toward the certificate and a still smaller number actually completing the GED program. Based on forthcoming recommendations from the Governor's Education 2000 Commission, the state Department of Education plans to move beyond GRADS and GOALS to develop a comprehensive teen parent policy that systematically addresses such students' educational and social service needs.

Should a teen parent targeted for participation in Project Learn develop excessive absences or drop out, she will face a flat $62 grant reduction until she demonstrates renewed compliance. However, each month that the Project Learn student meets the attendance requirement, she will receive a $62 bonus in addition to her monthly AFDC grant to offset the added ex-

penses associated with participating in the educational program and to reward her cooperation.

Maryland

Maryland has applied for federal approval of its Young Parents Education Initiative which would require pregnant and parenting AFDC recipients who are under 21 and who have children three months of age and older to enroll in an educational program. The program would operate on a pilot basis in four counties. Participants' attendance would be reported to local welfare agencies by school officials on a monthly basis.

Three unexcused absences would constitute a failure to satisfy the attendance requirement. If a student twice exceeded the maximum number of unexcused absences, she would be sanctioned by having her share of the grant subtracted from the next monthly payment. However, if the pregnant recipient were the only dependent in an AFDC household, her failure to cooperate would disqualify the unit from assistance. During summer vacations, sanctions would be suspended due to the impossibility of compliance unless arrangements could be made for summer school attendance.

Day care would be arranged and paid for by the local welfare agency "if needed." This proviso presumably reflects an effort to steer participants toward using family members to provide necessary care at no expense to the state.

Each young parent would have an "Intensive Case Manager" who will develop a written service agreement and an educational plan with the student. The educational plan would place the student in high school or in a vocational education or GED program.

Florida

Florida also imposes a form of learnfare as part of its Project Independence. Pregnant or parenting recipients age 14 to 20 can satisfy WIN work requirements by attending high school or an alternative educational program for a minimum of 30 hours per week. The teen parent receives unspecified case management services but faces WIN sanctions if she refuses the education option and fails to enroll in the job training or work components of Project Independence.

Although Florida amended its Dropout Prevention Act in 1986 to address the needs of school age parents by encouraging school districts to provide child care and other support services to pregnant and parenting teens, Project Independence makes no provision for caseworkers to ensure that eligible teen parents residing in districts with a school age parent program are advised of the availability of such services or are placed in existing programs or on appropriate waiting lists.

New Jersey

New Jersey has begun a program called Teen Progress, operating only in Newark and Camden. This experimental program mandates enrollment in school or in job training programs for first time AFDC applicants under 20 who have only one child. Newark and Camden were chosen as the sites for the experiment because, although these two cities have only 5% of the state's population, they represent 28% of the state's welfare caseload and 20% of the births to mothers under age 20.

When the young mother's child reaches six months of age, she must enroll in Teen Progress unless unable to do so due to illness or disability. If she is under 18, she will be steered toward returning to high school. If she is over 18 or a return to high school is viewed as inappropriate, she will be enrolled in a job training program. Both education and training programs include parenting and family planning courses. Each participant must attend program activities for at least 30 hours per week. This time requirement can be satisfied in a school or training center or by combining 10 hours of GED instruction with 20 hours of employment. Failure by an eligible participant to enroll in an education or training program will result in loss of her proportionate share of the family grant for each month of inactivity.

Upon enrolling in the program, Teen Progress parents receive an individualized assessment from a case manager, who acts as a service broker, trying to arrange support services, such as child care and transportation, that make participation possible. Child care can be provided by family members, who will be trained by Teen Progress staff and receive a stipend for their services. This approach to the issue of child care for school age parents is a sensible and sensitive response to both young parents' frequent reticence to leave a child in the care of strangers and the shortage of school-based child care facilities. It also represents an admirable attempt to develop and implement standards for the care of low income children by providing training and funds to improve the conditions in the caregiving situation.

Teen Progress also has several other distinctive and positive elements. It offers an interim service plan to young parents with substance abuse or English language deficiency problems. These difficulties are addressed before such participants enter the education or job training segments of the program. It operates the MOMS (Mothers of Mothers) project as an adjunct to Teen Progress in Newark. This project involves participants' mothers in the development and implementation of service plans.

In addition, if the absent father in each case can be identified, the state child support enforcement agency seeks to expedite paternity establishment. If a participant's child's legal father also receives public aid (AFDC, food stamps, or GA), he too will be required to participate in WIN, Job Search or GA Employability Program activities. According to program ad-

ministrators, this program component remains largely aspirational to date, with most program activity focusing on the teen mothers. However, recognition of the need to include absent fathers in program design is at least symbolically significant.

Unfortunately, Teen Progress also does not explicitly connect its operation to the delivery of specific educational services. Participating students may, however, be able to qualify for existing school programs aimed at helping at risk youth. For example, a Teen Progress student may be eligible to participate in compensatory education programs "designed to assist pupils who have academic, social, economic or environmental needs that prevent them from succeeding in regular school programs"1or for services from New Jersey's recently initiated School Based Youth Services Program.

The Teen Progress program is especially interesting because it takes place amidst longstanding controversy about the historically deficient performance of the underfinanced, property poor school districts of Newark and Camden. Both school systems have been unable to meet basic performance standards under New Jersey's school takeover legislation. According to the recent ruling of state administrative law judge considering a challenge to the New Jersey school financing system, both districts have been unable with current resources to provide the "thorough and efficient" system of public education guaranteed all students by the New Jersey constitution.

Because Teen Progress provides supplemental services, such as after-school parenting workshops, in high school facilities, it represents an infusion of resources for the struggling schools of Camden and Newark. School officials have therefore been receptive to the program, seeing it as a new funding and service option for at least one subset of the districts' needy student population.

New Mexico

New Mexico also plans to operate a limited version of learnfare focusing on AFDC youths aged 14 to 16 who have dropped out of school in three counties, Taos, Rio Arriba and Santa Fe. These youths will be required to register with the county welfare department and receive counseling aimed at getting the youths back into high school or a vocational educational program. If the youth refuses to participate in counseling, his or her share of the family AFDC grant will be withheld until he agrees to cooperate.

This design represents a departure from the state's original learnfare plan which would have imposed a high school completion requirement on AFDC heads of households and teen parents if their children were age three or older. Concern about the availability of necessary child care and special educational resources appear to have prompted the state to scale down its program changes.

Wisconsin

Wisconsin, the first state to implement a learnfare program, requires AFDC recipients who are minor parents or teenagers between the ages of thirteen and nineteen to attend school regularly in order for their families to continue to qualify for the full AFDC grant. The program is designed to operate in the following manner: When a family is applying for AFDC or when a family's eligibility is periodically redetermined, the AFDC caseworker reviews any teenage case member's school attendance records from the most recently completed semester. If the teenager has had ten or more unexcused absences during that time, the teenager will be required to meet a monthly attendance requirement in order for his or her family to continue to qualify for the full AFDC payment.

To meet this attendance requirement, a student can have no more than two full days of unexcused absences in a calendar month. The definition of what constitutes an unexcused absence will be left to the local school district to determine according to its local standards. A statewide definition applicable to AFDC teens will not be established by the Department of Health and Social Services. If a teenager is a dropout at the time of AFDC application or redetermination, that is, if he or she has 20 consecutive full days of unexcused absences and currently is not in school, he or she will be required to enroll in school and meet the monthly attendance requirement.

Failure of the teens to meet these enrollment and attendance requirements will result in the loss of their family of the teenager's share of the AFDC grant. If the targeted teenager is the only minor in the home, his or her disqualification for assistance renders the mother or caretaker categorically ineligible for AFDC as there will no longer be an eligible needy and dependent child in the home. Acting in response to the concerns of welfare rights advocates and state legislators, the state welfare agency has agreed to continue to provide assistance in an amount to meet the needs of the caretaker for three months after the child is taken off the grant.

Once a teenager has been identified as obligated to meet the monthly attendance requirement, his or her school will regularly forward attendance data on the student to the local social service agency. If review of the data reveals more than two unexcused absences, the AFDC household will be notified in writing of the attendance violation and of the amount of aid that will be withheld from the next grant payment. The sanction notice will also advise the family of their right to contest the grant reduction at a fair hearing and will indicate how the student or parent can contact the local school district to request that the student receive at risk student services. The grant reduction will remain in effect for one month for each month the student fails to meet the attendance requirement. If the student has been sanctioned for dropping out, the grant reduction will remain in effect until the student

produces verification that he or she has re-enrolled in school and met the attendance requirement for at least one month. The dropout, unlike the student who has simply failed to meet the attendance standard, will be required to enroll in and attend summer school if that is the only way the student can manifest continuing compliance with the attendance requirement.

Sanctions will not be imposed and the student will not be subject to attendance reporting under the following circumstances, considered by the social service agency to be good cause for noncompliance: (1) the student is the mother of a child less than ninety days old; (2) the minor parent is unable to obtain child care from a licensed or certified provider or from a school based program because such care is unavailable, inaccessible or available only at a cost which exceeds the maximum authorized county reimbursement rate; (3) the student cannot obtain necessary transportation to the child care center; (4) the student is physically incapacitated; or (5) the student is between the ages of 16 and 19 and is not expected to complete high school before age 20. Such a student would, however, have to participate in the work registration component of the state's WIN program.

The first phase of the program operation applied only to 13 and 14 year old students and teen parents and resulted in sanctions imposed May 1, 1988. The program expanded to cover the remaining older students on September 1 and the first sanctions under the full scale program will be imposed in November, 1988.

Lessons from Learnfare Battles

Wisconsin, in another first, has already had its learnfare program subjected to legal challenge by sanctioned AFDC recipients. The courtroom confrontation had been prefigured by a series of disagreements between legislators and Governor Tommy Thompson as the learnfare legislation took shape.

As originally drafted by the legislature, the school attendance requirement was to apply only to minor parents with children over three months of age if such parents were able to obtain appropriate child care. Before being sanctioned for failing to meet school attendance requirements, a student would have been given an opportunity to participate in an educational program for children at-risk or for school-age parents.

Using his line item veto power, Governor Thompson widened the program's reach and narrowed the pre-sanction protection available to AFDC students and their families, making the attendance requirements applicable to all AFDC teens between thirteen and nineteen who had not graduated from high school and who were physically able to attend school.

He also eliminated the pre-sanction opportunity to enroll in an at-risk educational program requiring instead that the student and family would be sanctioned first and offered an opportunity to receive at-risk services only after grant reduction.

Wisconsin's Department of Health and Social Services then developed rules to implement the program, incorporating administratively some of the protections removed from the statute by Governor Thompson. For example, the agency's rules established exemptions from participation for minor parents with children under three months of age or who are unable to obtain child care.

Despite the incorporation of these protections, many legislators remained concerned about the changes Governor Thompson had made in the program's nature and scope. In November, 1987, the legislature's Joint Committee to Review Administrative Rules suspended DHSS's implementing regulations. The suspension was rescinded in December and the Department recreated the learnfare rules, altering them to respond to legislative concerns regarding the pace of implementation by breaking learnfare into two phases as previously described.

Meanwhile, members of the legislature drafted a new learnfare statute proposing the following changes in the pre-sanction phase of the learnfare program: An AFDC recipient would not be sanctioned for failure to attend school unless the school had first notified the student's parent or guardian of his or her educational difficulties and offered the student a program of curriculum modification structured to meet the student's particular educational needs. Also, before the imposition of sanctions, the local welfare agency would be required to hold a fact-finding hearing to determine whether any exceptions to the school attendance requirement apply to the recipient. These legislative changes again failed due to the governor's opposition.

When sanctions affecting families with minor parents and thirteen and fourteen year old dependents were imposed in May, 395 households received notices of grant reductions. 16,299 students were subject to the learnfare requirements (3,522 teen parents and 12,777 thirteen and fourteen year olds). Seventeen of the sanctioned households requested fair hearings to contest their sanctions and subsequently became plaintiffs in a class action suit filed by Legal Action of Wisconsin in Milwaukee to challenge the legality of the learnfare system and the constitutionality of the sanction process.

Plaintiffs presented three principal arguments. First, they construed language in the waiver proposal Wisconsin submitted to HHS as a promise of coordination between the AFDC system's identification of truant students and the education system's delivery of at-risk services. The language cited

by the plaintiffs was offered by the state in a section of the waiver proposal explaining the rationale for the requirement:

> *The school requirement for all teen members of AFDC households between 13 and 18 years old will permit the state to give the teens a clearly understandable and monetarily tangible reason to pursue their education. Obviously, in and of itself, it may not be sufficient to motivate a teen to continue schooling. However, used in conjunction with a wide range of school and social service programs, it should increase the overall effectiveness of the state's efforts to educate these children. (emphasis added)*

Plaintiffs construed this statement as the creation of an absolute obligation on the part of the state to provide educational and social services in advance of and in conjunction with learnfare sanctions.

Second, plaintiffs asserted that legally required absence notification and at-risk student identification have not occurred prior to the imposition of truancy related sanctions. According to pre-existing provisions of the state education code, a school district must inform a parent of a child's truancy no later than the end of the second school day after it occurs and must identify students manifesting at-risk characteristics, such as poverty, absenteeism, school age pregnancy, and repeated performance below grade level. Once identified by the school district or by requests for assistance from student or parent, these at-risk students are entitled to receive an individualized learning plan with special services to be delivered in school or in an alternative setting.

As plaintiffs presented this second claim, it was subsumed in the allegation of the violation of the waiver terms, what they characterized as the state's promise. This set of allegations could have, however, presented a slightly different and distinct claim. Regardless of the content of the waiver terms, learnfare in no way suspended the operation of existing state education laws, which when read against the terms of the learnfare statute created an interdependent set of obligations governing the actions of AFDC recipients, local welfare agencies, and education authorities. To reinforce this understanding of learnfare, plaintiffs could have sued the state education agency and the local school districts in which the plaintiff families lived on the grounds that these entities' failures to perform legally required functions (notification/at risk identification) precipitated the imposition of sanctions. Although such a claim poses proximate cause problems, the presentation of the facts supporting such allegations could have exposed how these learnfare families were failed by two careless systems.

The plaintiff class supported their allegations regarding serious omissions on the education side of the learnfare system with the following facts from the named plaintiffs' cases:

* One plaintiff was not notified by her son's school attendance officer until he had missed four days of school. Once she was notified of the truancy, she spoke to her child and he has missed no subsequent days. Although her son was two grades behind his age group and had poor basic skills according to test measurements, he had never been identified as a child-at-risk and his mother had never been contacted by the school district's at-risk coordinator;
* Another plaintiff was a 17 year-old mother repeating ninth grade. She had repeated an earlier grade as well but had never been identified as a student at risk. Her sanctioned absences were caused by her child's illness and WIC appointments. Her school did not accept these circumstances as excuses and the social services agency did not evaluate the treatment of these absences as unexcused before sanctioning this recipient;
* A third plaintiff, aged 19, had completed 11 years of school in Puerto Rico. She and her unemployed husband had one child and were expecting a second. Last year, she had tried to register with the Milwaukee school system in order to finish high school but was told she was too old to attend a regular school. Although the plaintiff was notified of the attendance requirement, her caseworker never explored why she was not currently in school, did not offer any information or guidance regarding school options other than regular high school for this older student, despite her evident desire to complete high school if possible.

These facts belie learnfare advocates' assumptions that AFDC parents are unconcerned about their children's educational progress and that AFDC students who are out of school lack the motivation to return on their own. The shoddy performance by caseworkers and local education authorities also certainly casts doubt over several of the learnfare program's more benevolent pretensions or aspirations, the stimulation of parental involvement in the child's school life and the program's advertised outcome, high school completion, an unlikely result for students already years behind, enrolled in no remedial program and denied access to alternative education programs.

Plaintiff's third claim focused on the allegedly arbitrary and capricious manner in which sanctions were administered, which plaintiffs charged constituted a violation of the Social Security Act as well as of due process and equal protection principles. Plaintiffs also generally asserted that the learnfare system contravened the policy and purpose of the Social Security Act because its "sanction first/examine circumstances later" approach imposed unnecessary hardships on families and worked to deny financial sup-

port to needy children and their custodians. More specifically, they contended:

1. the application of the good cause absence standard by local school districts results in erratic and unfair decisions. The state acknowledges that certain regions of the state accept as excuses for absences events that do not even occur in the lives of students in other areas. For example, deer-hunting and agricultural activities are good cause of missing school in some northern and rural districts but not in Milwaukee.

2. the caseworkers' administration of the program's statutory and regulatory guidelines appeared neither systematic nor uniform. Caseworkers, as seen in the examples offered by the named plaintiffs, did not consistently consider or properly apply existing exemptions; and

3. if the state planned to develop additional exemptions on a case-by-case basis through the fair hearing process, such an ad hoc approach represented a denial of due process as recipients would not be able to foresee the possible grounds for a favorable decision or to rely on the hearing officers' application of consistent, regularized guidelines.

In rebuttal, the state maintained that AFDC children were not being subjected to any special requirements because school attendance is mandatory for all school age children and, in fact, a child could, according to the state, be truant under state law but not in violation of learnfare. The state argued that the learnfare program actually gave at least some AFDC youth an advantage by providing money for transportation and child care to enable teen parents to comply with the school attendance law. In support of its position, the state cited reports of the number of teen parents "taking advantage" of learnfare. Those classified as "taking advantage" were teen parents who have signed up for day care at the local social service agencies. According to the state, the number of such requests had risen from 39 in January 1987 (pre-learnfare) to 370 in March 1988 (mid-learnfare).

The state also described other assistance as uniquely available to AFDC learnfare students, such as money from alternative education, such as vocational education and GED programs, and, beginning in the fall, a learnfare coordinator at each local social service agency who will assist AFDC teens enroll in education programs, verify claimed exemptions and assist in obtaining child care and transportation. This learnfare coordinator concept, an apparent effort to respond to legitimate questions about service gaps in prior program operation, represents a potentially valuable alteration of the program's design.

In terms of legal arguments, the state first disputed plaintiffs' standing to assert a claim based on an alleged deviation from the waiver terms. The state

contended that the enforcement of the waiver terms lay in the exclusive jurisdiction of the Secretary of HHS. In addition, although the state did not accept plaintiffs' characterization of a waiver as a state plan amendment, it denied that such an amendment or even the state plan itself creates rights enforceable by AFDC recipients. The question of the legal status of waiver terms remains unresolved as it was not necessary for the judge to reach the issue in this suit. This question will, however, undoubtedly reappear if waivers proliferate and it becomes necessary to litigate challenges to states' waiver administration.

Second, the state portrayed the current system in which local school districts apply their own definitions of good cause for absence and the social service agency applies different program exemption criteria as a division of labor necessary to accommodate the fact that learnfare is a joint venture demanding the cooperation of two legally separate systems but not the subordination of one to the other.

The state also argued that the due process demands of the Constitution were satisfied by the fair hearing process, which the state described as designed to develop additional definitions of good cause for failure to attend school. The state further asserted that plaintiffs have an adequate and exclusive administrative remedy in the fair hearing process. The state argued that this appeal phase could not be bypassed through the plaintiffs' class suit. The state added that because actual grant reduction is suspended pending the resolution of an administrative appeal, the family suffered no actual harm under this sequence.

In refusing the plaintiffs' request to enjoin further operation of the learnfare program and the imposition of sanctions, the Milwaukee circuit court judge accepted the state's position that the administrative remedy, the fair hearing process, was adequate to address the named plaintiffs' concerns, particularly because she saw hope for success for many of them in existing exemptions or exceptions to program participation. In addition, the judge questioned the composition of the plaintiff class, suggesting that as originally defined it was overinclusive.

Based on the facts before her, the judge saw no evidence that implementation difficulties were a statewide problem. Rather, she perceived the issues of schools' failure to notify parents of absences in a timely fashion or to identify and serve at risk students as deficiencies peculiar to the Milwaukee district, which the judge noted had, prior to learnfare, already had long waiting lists for special remedial or alternative educational programs. Finally, the judge rejected plaintiffs' reading of the waiver terms to create an affirmative duty on the part of the state to offer any necessary educational assistance to students subject to learnfare before imposing sanctions. The judge

read the disputed terms as expressing only the state's commitment to try to help AFDC students who failed to attend school.

Despite initial setbacks, the sanctioned participants' suit and legislators' efforts have produced constructive changes in the operation of Wisconsin's learnfare and at-risk programs. Embarrassed social service officials have exerted pressure on local welfare agencies to follow program guidelines more scrupulously and on local school districts to expand at-risk identification and service efforts, clarify attendance policy and improve attendance monitoring and parental notification of absences. The state human services agency will now offer the services of a learnfare coordinator to students in each local area, and students not attending school but already on a waiting list for an alternative educational program at the time the monthly attendance requirement is not met will not be subject to sanctions. Regrettably, these incremental improvements have occurred only after AFDC students and families suffered sanctions due to service failures.

Wisconsin's experience demonstrates the difficulties states can expect when initiating a large scale learnfare program. Wisconsin's mistakes, however, need not be repeated. First, when planning a learnfare program and setting a schedule for its operation and expansion, administrators cannot simply assume an adequate at-risk service infrastructure exists to respond to the needs of returning students, confusing the existence of statutory obligations with actual state or local performance. The hazards such flawed assumptions pose to participants and to program credibility can be minimized only by consulting educators at the state and local level throughout the planning and implementation process.

Planners must develop reasonable estimates of anticipated added expenses to be incurred by local schools districts and local welfare agencies and send the state dollars needed to accomplish state directives. Finally and perhaps most critically, any learnfare program must operate in a manner consistent with the statutory protections offered to students by pre-existing truancy and at-risk education provisions.

California

California's failed learnfare legislation attempted to make regular school attendance an eligibility requirement for all school age AFDC family members. Although the legislation was defeated in the most recent General Assembly session, it is likely to resurface next term and gain momentum from the endorsement the learnfare concept recently received from the California Commission on Educational Quality in the commission's report to the governor.

The California legislation, A.B. 3808, would have subjected an AFDC family to a flat $50 grant reduction if any school age child in the family had

over ten unexcused absences in a semester or twenty such absences per year and the parent refused to participate in efforts to resolve the student's attendance problem through informal and formal conciliation efforts with the assigned caseworker. The amount subtracted from the grant each month would be held in trust for the family until the student resumed regular attendance.

Upon receiving a report from school officials that an identified AFDC student failed to meet the prescribed attendance standard, a county welfare worker would have been charged with determining whether the attendance problem was, in the terms of the legislation, child-caused, parent-caused or health-caused. If the absences were health-caused, the caseworker would contact the school to arrange for delivery of school assignments or home schooling if the child would have to stay at home for a prolonged period. The caseworker would investigate whether the health problem was related to home hygiene and then counsel the family on needed changes as well as on "the importance of school attendance despite minor ailments." A child-caused problem was defined as one in which the student defies parental authority regarding school attendance and is incorrigible. The county welfare department could then refer the student to the local School Attendance Review Board (SARB) or to juvenile court for further action pursuant to state truancy and delinquency laws. Child-caused absences would not result in sanctions. A parent-caused problem would involve a variety of family problems and would be redressed by obtaining donations of needed items, such as clothing, shoes or alarm clocks, and arranging conferences with the parent or parents.

When support for this form of learnfare waned, its chief sponsor attempted to alter the legislation radically. In its final and ultimately unsuccessful form, the bill simply would have required a SARB in a pilot district to monitor attendance and provide counseling to truants and dropouts. As local SARBs are already directed to carry out this function under existing law, this "revision" received little support.

As in the Wisconsin controversy, arguments raised by opponents of A.B. 3808 highlight what to avoid in constructing a learnfare program. The proposed California approach:

- offered no guarantee of educational services or referral to local school district personnel for consideration of what educational changes might be needed to help the troubled student in school;
- reflected no awareness that an attendance problem could be school-caused. By oversimplifying the problem of truancy to a question of the need for alarm clocks, for example, the legislation ignored other plausible origins of truancy, such as a poor learning environment, problems of school violence, undiagnosed learning

disabilities or the child's need for special or compensatory educational assistance;

- aggravated one of the most likely culprits for the child's educational problems, the family's poverty, by further reducing the assistance unit already sub-poverty income without first offering ameliorative services or incentives for student and parent cooperation;
- increased the potential for acrimony within the family by setting up a system in which the parent's self interest is pitted against the interest of the child. Under the proposed legislation, an AFDC parent, knowing "child-caused" problems represent a sure way to avoid sanctions, would have ample reason to characterize the child in question as incorrigible or delinquent in ordered to preserve the remaining family members' income;
- ignored real administrative difficulties with attendance monitoring by local schools. The legislation made no attempt to resolve questions regarding the need to maintain the confidentiality of a child's AFDC status and similarly failed to consider how a school based semester attendance reporting system could respond to families' frequent changes in AFDC status;
- created a redundant and less efficient alternative to the use of local SARBs to deal with truants and their families. These entities are already required under California law to identify and assist students with attendance problems and to take action against irresponsible parents in truancy cases. The learnfare legislation attempted to put welfare caseworkers, unfamiliar with truancy and other educational problems or programs, in charge of one segment of the SARB staff's caseload, AFDC students; and
- did all of the above at tremendous cost to the state, a cost not offset under the trust plan by sanction savings or by reasonably anticipated federal reimbursement. The learnfare bill would have cost an estimated $23 million per year due to the increased demand on welfare caseworkers' time and other consequent administrative costs.

Program Design Implications

The evolution of the Wisconsin program and the demise of the California legislation offer an illuminating backdrop for consideration of what would constitute desirable and undesirable features of a learnfare program that applies to school age AFDC dependents. Legislators, public welfare administrators and recipient advocates must gauge the advisability of a learnfare initiative in relation to what to what educational resources are available to serve targeted students. In a joint undertaking, educators and

social service policymakers must develop an accurate picture of current educational conditions and evaluate the availability of the social services learnfare students can be anticipated to need. To represent a hopeful and helpful change for school age AFDC dependents, a learnfare program must at a minimum:

- be accompanied by creation and enforcement of at-risk educational entitlements;
- offer students individualized education and social services plans developed with the participation of parents;
- designate staff in each school district to monitor student progress, respond to needs for changes in a student's curriculum or overall educational plan, and coordinate social service delivery;
- provide a range of education options and alternative settings to students and operate necessary programs in conformity with state and federal standards;
- construct a uniform definition of excused absences to which school districts may add based on local conditions;
- avoid the creation of perverse incentives for students to use school suspension and expulsion procedures as a way to avoid sanctions;
- require that specified remedial steps, such as family counseling and educational modifications, be exhausted before sanctions can be imposed.

It is unlikely that many states will be prepared in terms of either financial resources or existing institutions to execute an effective learnfare plan covering all school-age AFDC dependents due to the volume of students to be served and the wide variety of needs they would manifest. However, the learnfare concept may remain attractive to policymakers who could then consider a more limited education mandate, choosing, as the majority of existing or planned learnfare programs have done, to focus on minor parents receiving AFDC.

Targeting Teen Parents: A Palatable Alternative

Drawing on contemporary social science literature, a convincing case can be made for targeting teen parents for intensive attention from social service and educational agencies. Analyses of AFDC caseloads indicate that young, never married women who enter the program when their children are under three years old constitute the population at greatest risk of long term welfare dependency. Over forty percent of young women in this group will spend ten or more years on AFDC. Of those who begin their first welfare

spell before age 22, one third will spend over nine years on AFDC with the average duration of AFDC receipt for this population being 8.2 years. When facing years of sub-poverty level income in an AFDC household, these young women can often look back on years of educational disappointments and difficulties, problems which appear to bear a significant contributory relationship to premature parenthood and the prospect of continued poverty.

Two thirds of all AFDC mothers between 17 and 21 lack basic literacy skills, reading at or below sixth grade level. Teens with poor basic skills are five times as likely to become mothers before age 16 as are those with average skills and young women with poor skills are four times as likely as average students to have more than one child while in their teens. In contrast, out of wedlock births among young women declines in direct proportion to their higher scores on tests of essential functional math and reading skills. Without intervention and remedial education, young women with economically disabling educational deficits seem destined to create what one advocacy group has described as "the inter-generational repetition of poverty and lack of opportunity" because, for the children of such disadvantaged parents, a parent's educational attainment becomes a fairly accurate prediction of the child's scholastic success.

Thus, we can trace the origins of an imperative to strive to overcome teen parents' basic skills deficiencies, not simply to save taxpayer dollars spent on welfare but to mitigate lifelong adverse consequences for the targeted young mothers and children.

A potentially constructive program aimed at teen parents on AFDC would borrow elements from existing programs to develop a more comprehensive service-oriented model than has heretofore been used. With careful planning and the necessary resource commitment, this brand of learnfare could serve as a magnet draw essential services to school-age parents and their children and thereby reflecting a family development approach to welfare reform.

Again, a candid assessment of the readiness of school and social service facilities and programs must be the first step in development of a teen parent learnfare plan. Assuming that neither set of institutions will be instantly ready to accommodate an influx of the total number of teen parents and their small children, operation of a Massachusetts ET style program with mandatory identification and registration of school-age parents but "volunteers first" service priorities makes sense. Working first with volunteers would also allay educators' fears about a mass influx of unwilling learners. When further refining program priorities, architects of a learnfare program may want to serve first time minor parents first in the hope of preventing subsequent teen pregnancy and in recognition of the limited number of child care slots.

If the program plans to rely on volunteers, it will still have to engage in substantial outreach to teen parents in order to overcome their understandable hesitations about returning to school, a setting in which they may have never been successful or comfortable, and about doing so despite new concerns about the care of their children.

In grappling with questions of scale and pace of program operation, learnfare planners, representatives of both education and social service entities, must also account for regional disparities in readiness to serve returning students due to documented deficiencies in school districts' performance, as in Newark and Camden, the size of pre-existing waiting lists for at-risk student programs, and shortages of school-based or other appropriate child care. A state can respond to these realities by:

- choosing to adopt a statewide program but structuring the implementation schedule so that selected school districts and social service agencies are required to meet expansion and performance criteria with the help of increased state funds, before teen parents become subject to any attendance requirement; or
- selecting as first priority program sites the neediest school districts or population centers in the state in order to inject new resources into fiscally desperate communities. This triage endeavor presents obvious risks; or
- operating a limited program selecting either only school districts with demonstrated commitment to and experience in the education of teen parents and then expanding their existing programs to serve learnfare students.

It is essential for both administrators and advocates to be aware of state and local educational history as they consider learnfare design and implementation issues. These actors should look particularly at the relationship between the demands a learnfare program will place on a school system and other educational realities such as a local desegregation plan or a prior finding of unconstitutional denial of education rights due to school financing inequities.

In all chosen sites, the exemptions from participation established by program guidelines should recognize:

- the health of child and mother, based on submission of necessary medical documentation;
- the availability of licensed or certified child care; and
- the accessibility of transportation to the child care facility and to school and the length of time involved in such travel.

Looking specifically at the issue of child care as a precondition to participation, programs must assume a helpful stance, exploring a variety of child care

choices with the teen parent, including school-based care, if available. In particular, the minor parent must not be pressured to use relatives as caretakers simply to minimize the state's expenditures for participant child care. However, if the teen parent prefers that a family member care for her child, the local welfare agency should offer training to the relative and provide a stipend to the relative for the care. Assuming relatives always can and will care for teen parents' infants for free is unrealistic.

Pursuant to a 1987 amendment to the North Carolina Family Support Act, teen parents on AFDC who voluntarily seek to continue their education or return to school can receive a special needs allowance to cover child care and transportation expenses up to specified limits. However, if a family member cares for the teen parent's child, that family member cannot receive the otherwise available $200 per month payment for individual child care arrangements unless the teen parent can verify that the family member stopped other work solely to provide the care in question. To date, only 35 households have received these special grants. This limited participation rate suggests that such minimalist assistance cannot advance ambitious education and anti-dependency goals.

Moreover, any set of participation exemptions must not be blind to relevant educational conditions. Such exemptions should be structured to avoid forcing teen parents to return to schools made unsafe by physical conditions or violence, to schools in a legally recognized failing school district before corrective action plans have been adopted and improved performance standards met, or to school districts without adequate alternative education programs.

The program must adopt uniform definitions for excused absences that will apply to all learnfare participants, supplementing local school standards in order to protect participants from the vagaries of different district attendance policies. This set of definitions should acknowledge the responsibilities and demands of the teen parent's situation, by, for example, excusing absences caused by appointments with physicians or with court or social services personnel. Such absences could, however, be minimized through school based health and social service delivery.

The responsibilities of student, school and local welfare agency should be enumerated in a participation agreement or contract. This agreement should be developed by the teen parent, an advocate or other adult of her choice, a designated school official and the caseworker. This agreement should contain an individualized education plan for the teen parent as well as a child development plan for her child. This plan would require local school officials to offer the student all remedial or compensatory help for which she is eligible and demand that the welfare agency arrange for or provide all appropriate support services.

The range of support services available to participants should include:

- summer job placement;
- post-program job search assistance;
- interim service plans, allowing teen parents to remedy problems, such as alcohol or drug dependency, that will seriously impede academic progress, before re-entering the classroom;
- paternity establishment and child support enforcement services. The state's identification and pursuit of the absent fathers should set the stage for the second phase of program operation, enrollment of school age fathers in education and training programs.

The teen mother should also be assigned to work with an adult volunteer from her community in activities resembling those of the South Carolina Teen Companion Program or the Community Woman component of Project Redirection in San Diego. This adult would try to be the teen mother's friend and adviser. The adult would visit the teen at home, assist in the development of her educational plan, monitor the student's progress, offer counseling to the student, relay the student's concerns and needs to the local welfare agency, and offer parenting instruction to the teen mother and possibly child care instruction to a family member caring for the student's child while she is at school.

Sanctions for a teen parent's nonparticipation should be preceded by informal and formal conciliation involving those who developed the participation agreement. If such steps do not resolve the dispute, a progressive sanction sequence could ensue, starting with partial protective payments and ending with a flat grant reduction in an amount less than the teen parent's proportionate share of the AFDC grant. Such sanctions would, of course only be imposed after an opportunity for a fair hearing.

CONCLUSION

Children and youth living below the poverty line as AFDC recipients do are educationally needy and deserve special attention from both the education and social service systems in order to overcome basic skills deficits and achieve desirable educational outcomes. However, a sanction without service learnfare model will likely achieve neither basic attendance improvement or more ambitious educational remediation goals. Such an approach will not address students' fundamental educational difficulties and therefore will not resolve either their attendance or achievement problems.

Existing learnfare programs and proposals have been marred by a common flaw. They too often appear to have been formulated with an eye only

toward superficial short-term goals instead of concentrating on the capacities of current educational and social service agencies to serve targeted students and actually redress students' learning problems. This preoccupation with forcing absent students to return to school while neglecting to offer needed remedial, compensatory or alternative educational programs or essential social service supports represents a prescription for continued disappointment for both government and the AFDC families.

Groping for a solution to the educational problems experienced by AFDC children and youth, some states have made learnfare, a punitive last resort, their first experimental choice. Officials' good intentions appear destined to lead to bad results for the children and families affected, creating a form of "help that can hurt." Although a service-oriented brand of learnfare may hold promise for teen parents in areas in which the education and child care systems and other community resources can meet their needs, extending the reach of a punitive learnfare approach downward to cover all school age AFDC dependents would be unwise. Policymakers' energy would be better spent developing and implementing a comprehensive at-risk education and social service system. The Council of Chief State School Officers' model statute creating educational entitlements for at-risk students exemplifies such a system of at-risk services. (Copies of the model statute may be obtained from the Council of Chief State School Officers, 379 Hall of the States, 400 North Capitol Street, N.W., Washington, D.C. 20001). Learnfare threatens to become a distraction from that more positive and probably more successful approach.

By often relying on a rhetoric that attributes impoverished students' educational failings to little more than a lack of individual motivation and an abdication of parental responsibility, learnfare could undermine more systematic and comprehensive efforts to improve the educational prospects for poor children and youth. This experiment's negative potential stems from its tendency to oversimplify poor students' educational situation and to avoid institutional reform issues.

Learnfare's appearance has, however, highlighted the interdependence of educators and social service caseworkers as they attempt to resolve the educational problems of AFDC students. If such recognition produces greater cooperation within a subsequent initiative aimed at helping at-risk students, learnfare will not be without heuristic value.

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